

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

August 29, 2019

The Honorable Sarah Netburn  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Pursuant to this Court's Individual Practices in Civil Cases III.e., the Plaintiffs' Executive Committees file this letter motion for oral argument of Plaintiffs' Motion to Vacate this Court's November 2018 Order and Allow Supplemental Document Discovery of Saudi Arabia Regarding Four of its Officials.

Briefing of the subject motion was completed on August 27, 2019, and courtesy copies of the motion papers were provided to the Court yesterday.

Plaintiffs' Motion to Vacate addresses many of the same facts presented in Plaintiffs' pending Motion to Compel the Federal Bureau of Investigation to Produce Documents From its Investigation of Saudi Government Officials' Assistance to the 9/11 Hijackers. Plaintiffs previously moved for oral argument of that Motion to Compel. ECF 4677 (July 11, 2019).

Oral argument has not previously been heard by the Court on the issues raised in the Motion to Vacate. Plaintiffs believe that oral argument would be of assistance to the Court, and the parties, because the Motion to Vacate raises important and unique issues of law and fact, and the record is substantial and complex.

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Earlier today, the PECs sent a draft of this letter to Saudi Arabia's counsel, Michael Kellogg, Esq., to determine Saudi Arabia's position on the motion and were advised: "We consider oral argument unnecessary and likely to cause delay. We therefore oppose the motion."

Respectfully submitted,

COZEN O'CONNOR

MOTLEY RICE

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On behalf of the MDL 1570 Plaintiffs'  
Exec. Committee for Commercial Claims

On behalf of the MDL 1570 Plaintiffs'  
Exec. Committee for Personal Injury and  
Death Claims

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/s/ Steven R. Pounian, Esquire

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On behalf of the MDL 1570 Plaintiffs'  
Exec. Committee for Personal Injury and  
Death Claims

cc: Hon. George B. Daniels, U.S.D.J. – via ECF  
All counsel - via ECF  
Sarah Normand, Esq. – via email  
Jeannette Vargas, Esq. – via email